



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
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November 12, 2013

The Honorable Kim McMillan
Mayor of the City of Clarksville
One Public Square, Fourth Floor
Clarksville, TN 37040

CERTIFIED MAIL RETURN RECEIPT
#7009 1680 0001 5180 8651

Re: NPDES Permit Number TNS075205
City of Clarksville Stormwater Management Program Audit

Dear Mayor McMillan:

The City of Clarksville (Clarksville) is an operator of a regulated small municipal separate storm sewer system (MS4). Clarksville has been granted coverage under the National Pollution Discharge Elimination System (NPDES) General Permit for Discharges from Small MS4s (tracking number TNS075205). Thank you and the City of Clarksville for the commitment to protect waters of the state and reduce the discharge of pollutants.

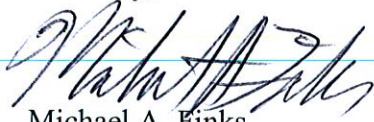
The NPDES permit requires Clarksville to develop and implement a Stormwater Management Program to reduce the discharge of pollutants from the City of Clarksville's MS4. The Stormwater Management Program shall include management practices; control techniques, system design and engineering methods; and such other provisions appropriate for the control of pollutants of concern. Clarksville must also document all the elements of the Stormwater Management Program in a Stormwater Management Plan (SWMP).

On August 13 and 14, 2013, I conducted an audit of City of Clarksville's program. Jeff Bryant, Jack Frazier, George Steward, John Goodlett, Angie Sykes, Jackie Overholser, Randy Petersen and Kenny Daniels were very cooperative and provided assistance during the audit. During the course of the audit, it was noted that some steps have been taken by the City of Clarksville to comply with the NPDES permit for small MS4's. The City of Clarksville has adopted ordinances, instituted plan reviews, started site inspections, pre-construction meetings, and initiated other actions that constitute a positive move forward for protecting the streams and waterways of Tennessee. However, there are a number of permit requirements that have remained unaddressed by the City of Clarksville since the 2006 audit. The two most prominent examples are failure to comply with Minimum Control Measure 1: Public Education and Outreach, and failure to comply with Minimum Control Measure 4: Construction Site Runoff Control.

Enclosed is a report that presents the findings of my August 13 and 14, 2013 audit. This report summarizes permit requirements and identifies remaining areas that the City of Clarksville must address to come into compliance with the NPDES permit. To begin bringing Clarksville into compliance, the Division requests a written response describing the activities taken or planned to correct or improve any item identified as a deficiency in the attached report. Please provide this office with a written response within 90 days of your receipt of this letter.

I appreciate your staff's cooperation and assistance during the audit. If you have any questions concerning the inspection, or if I may be of any further assistance to you in any way, please feel free to contact me at (615) 687-7115 or by email at Michael.finks@tn.gov. Your prompt attention to these matters is appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael A. Finks", written over a horizontal line.

Michael A. Finks
Nashville Environmental Field Office

Enclosures

Cc: Jeff Bryant, City of Clarksville SWMP